1	BRIAN T. REKOFKE		
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7	Los Angeles, CA 90067		
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9	Counsel for Defendants Ambassador Programs, l	Inc.,	
10	and Ambassadors Group, Inc.		
11	UNITED STATES DISTRICT COURT		
12	EASTERN DISTRICT OF	F WASHINGTON	
	K.S. by her interim guardians ad litem, and		
13	DOROTHY SPIOTTA and PAUL SPIOTTA,	No. CV 08-243-FVS	
14	Plaintiffs,		
15	V.	DEFENDANTS' JOINT	
16	AMD ACCADOD DDOOD AMC INC	MOTION FOR PROTECTIVE	
17	AMBASSADOR PROGRAMS, INC., AMBASSADORS GROUP, INC., PEOPLE	ORDER	
18	TO PEOPLE INTERNATIONAL,		
19	Defendants.		
20			
21			
22			
23			
24		WITHERSPOON, KELLEY, DAVENPORT & TOOLE, P.S.	

1	Pursuant to Federal Rule of Civil Procedure 26(c), Defendants jointly request the		
2	Court enter a protective order prohibiting the Plaintiffs from disclosing the contents of the		
3	Defendants' business contracts to the public, and requiring Plaintiffs to file the contracts		
4			
5	under seal if the contracts are filed as part of the Court record. This motion is supported by		
6	the Declaration of Kell Bodholt, the Declaration of Mary Eisenhower, and the Memorandum		
7	in Support of Defendants' Joint Motion for Protective Order and Defendants' Joint		
8	Response to Plaintiffs' Motion to Compel Agreements, filed herewith.		
9	DATED this 30th day of October 2009.		
10	EVANS, CRAVEN & LACKIE, P.S.	WITHERSPOON, KELLEY,	
11	EVANS, CRAVEN & LACKIE, F.S.	DAVENPORT & TOOLE, P.S.	
12	/s/ James B. King	/s/ Geana M. Van Dessel	
13	JAMES B. KING, WSBA No. 8723	BRIAN T. REKOFKE, WSBA No. 13260	
14	Email: jking@ecl-law.com 818 W Riverside Ave., Suite 250	Email: btr@wkdtlaw.com GEANA M. VAN DESSEL, WSBA No. 35969	
15	Spokane, WA 99201-0994	Email: gmv@wkdtlaw.com	
		422 W. Riverside Ave., Suite 1100	
16	Counsel for Defendant	Spokane, Washington 99201-0300	
17	People to People International	LOEB & LOEB	
18		JERRY S. PHILLIPS, admitted pro hac	
19		Email: jphillips@loeb.com	
		Counsel for Defendants Ambassador	
20		Programs, Inc., & Ambassadors Group, Inc.	
21			
22			
23			
24			
	DEFENDANTS' JOINT MOTION FOR PROTECTIVE ORDER - 2	WITHERSPOON, KELLEY, DAVENPORT & TOOLE, P.S. A PROFESSIONAL SERVICE CORPORATION	

1	CERTIFICATE OF SERVICE			
2	I hereby certify that on the 30th day of October, 2009:			
3	1	1. I electronically filed the foregoing Defendants' Joint Motion for Protectiv		
4	•		the Court using the CM/ECF System which will send	
5		notification of such filing to the	he following:	
6		Time Alex K. Danida	ting Country and a source of multiple and	
7		Timothy K. Ford:	timf@mhb.com, adanap@mhb.com, colleenf@mhb.com, lindamt@mhb.com	
8		Katherine C. Chamberlain:	katherinec@mhb.com, chrisb@mhb.com, jenniferk@mhb.com	
9		Kenneth Isserlis:	kisserlis@leeisserlis.com, lkellerman@leeisserlis.com	
10		James B. King:	jking@ecl-law.com,	
11			kschulman@ecl-law.com	
12	2. I hereby certary that I have		mailed by United States Postal Service the	
13		document to the following n below: NONE.	on-CM/ECF participants at the address listed	
14				
15	3.		nand delivered the document to the following	
16		participants at the address list	articipants at the address listed below: NONE.	
17				
18	mily Rousseau			
19	Emily Rousseau, Legal Assistant Witherspoon, Kelley, Davenport & Toole, P.S. 422 West Riverside Avenue, Suite 1100			
20				
21		• • • • • • • • • • • • • • • • • • •	WA 99201-0300 99) 624-5265	
22		Fax: (509)	458-2728	
23		emilyr@w	kdtlaw.com	
24				